THE HONORABLE RICHARD A. JONES 1 2 3 4 5 6 UNITED STATES DISTRICT COURT 7 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 9 ORG Lluch Salvado, S.A., CASE NO. 2:11-cv-00039RAJ 10 11 STIPULATION REGARDING Plaintiff, SCHEDULING MODIFICATION 12 v. **NOTING DATE:** March 11, 2011 13 DENDREON CORPORATION, 14 MITCHELL H. GOLD, and DAVID URDAL, 15 Defendants. 16 17 18 Defendants Dendreon Corporation, Dr. Mitchell Gold and Dr. David Urdal, and 19 plaintiff ORG Lluch Salvado, S.A. (collectively, "Parties"), through their counsel of record, 20 having met and conferred, submit the following Stipulation Regarding Scheduling 21 Modification. 22 1. The deadline for defendants to answer or otherwise respond to the Complaint for 23 Violations of the Securities Laws ("Complaint") is March 11, 2011. 24 2. Pursuant to the Court's February 16, 2011 Minute Order Regarding Initial 25 Disclosure, Joint Status Report, and Early Settlement [Dkt. 15], additional deadlines are as 26 follows: 27 STIP RE SCHEDULE MODIFICATION - 1

CASE No.: 2:11-cv-00039-RAJ

WILSON SONSINI GOODRICH & ROSATI
701 Fifth Avenue, Suite 5100
Seattle, WA 98104-7036

Tel: (206) 883-2500 Fax: (206) 883-2699

- a) Deadline for FRCP 26(f) conference shall be no later than March 18, 2011.
- b) Initial Disclosure Pursuant to FRCP 26(a)(1) shall be filed no later than March 25, 2011.
- Combined Joint Status Report and Discovery Plan as Required by FRCP
   26(f) and Local Rule CR 16 shall be filed no later than April 1, 2011.
- 3. The Parties have met and conferred, and agreed that, in order to allow sufficient time to conduct settlement negotiations, all current deadlines should be extended by 30 days as follows:
  - a) Deadline for defendants to answer or otherwise respond to Complaint shall be no later than April 11, 2011.
  - b) Deadline for FRCP 26(f) conference shall be no later than April 18, 2011.
  - c) Initial Disclosure Pursuant to FRCP 26(a)(1) shall be filed no later than April 25, 2011.
  - d) Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Rule CR 16 shall be filed no later than May 2, 2011.

1	DATED this 11th day of March 2011.
2	<u>s/Barry M. Kaplan</u> Barry M. Kaplan, WSBA #8661
3	Claire Loebs Davis, WSBA #39812 Wilson Sonsini Goodrich & Rosati
4	701 Fifth Avenue, Suite 5100 Seattle, WA 98104-7036
5	Telephone: (206) 883-2500 Fax: (206) 883-2699
6	Email: bkaplan@wsgr.com Email: cldavis@wsgr.com
7	
8	Attorneys for Defendants Dendreon Corporation and David Urdal
9	s/ Robert M. Sulkin
10	Robert M. Sulkin, WSBA No. 15425 Malaika M. Eaton, WSBA No. 32837
11	MCNAUL EBEL NAWROT & HELGREN 600 University Street, Suite 2700
12	Seattle, WA 98101
12	Telephone: (206) 467-1816 Facsimile: (206) 624-5128
13	Email: rsulkin@mcnaul.com
14	Email: meaton@mcnaul.com
14   15	Attorneys for Defendant Mitchell Gold
	s/ Steve W. Berman
16	Steve W. Berman, WSBA No. 12536 Karl Phillip Barth, WSBA No. 22780
17	HAGENS BERMAN SOBOL SHAPIRO
10	1918 8 <sup>th</sup> Avenue, Suite 3300
18	Seattle, WA 98101 Telephone: (206) 623-7292
19	Email: steve@hbsslaw.com
20	Email: karlb@hbsslaw.com
21	Ex Kano S. Sams II (admitted pro hac vice) Lionel Z. Glancy (admitted pro hac vice)
	GLANCY BINKOW & GOLDBERG
22	1801 Avenue of the Stars, Suite 311
23	Los Angeles, CA 90067 Telephone: (310) 201-9150
	Email: esams@glancylaw.com
24	Email: lglancy@glancylaw.com
25	Attorneys for Plaintiff
26	
27	

STIP RE SCHEDULE MODIFICATION - 3 CASE No.: 2:11-cv-00039-RAJ

WILSON SONSINI GOODRICH & ROSATI 701 Fifth Avenue, Suite 5100 Seattle, WA 98104-7036 Tel: (206) 883-2500

Tel: (206) 883-2500 Fax: (206) 883-2699

## **CERTIFICATE OF SERVICE**

I hereby certify that on March 11, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record who receive CM/ECF notification.

Dated: March 11, 2011

s/ Barry M. Kaplan Barry M. Kaplan, WSBA #8661

CERTIFICATE OF SERVICE - 4 CASE No.: 2:11-cv-00039-RAJ 4288114\_1.DOCX WILSON SONSINI GOODRICH & ROSATI

701 Fifth Avenue, Suite 5100 Seattle, WA 98104-7036 Tel: (206) 883-2500 Fax: (206) 883-2699